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7 Attorneys for Plaintiffs
8 SANRIO COMPANY, LTD. and SANRIO, INC.

9
10 UNITED STATES DISTRICT COURT
11 NORTHERN DISTRICT OF CALIFORNIA

12 SANRIO COMPANY, LTD., a Japanese
13 corporation and SANRIO, INC., a California
14 corporation,

Plaintiffs,

15 vs.

16 J.I.K. Accessories, Inc., Accessitive
17 Accessories, Inc., B.B. Apparels Inc., Amuseco
Accessories, Inc., Nana Accessory, Inc., Seanna
18 Corporation, Heiress Enterprises, Inc., Pinkland
Corporation, Inc., Bliss, Final Choice, Joon Sik
Bae, Yong Woo Kim, Any Bae, Jason Bae,
Brian Ban, Ryan Bae, Ho Yong Na, Sang Wha
19 Kim, Aeran Bae a/k/a Chris Bae, Jenny J. Lee,
Sukmin Bae, John Bae, Lisa Bae, Grace Kim,
Ken Chung, Yeun Sik Cha, Debbie Kim, DOES
20 1-10,

21 Defendants

22 Civil Action No. C 09-00440 MHP

23 STIPULATION TO EXTEND
24 DISCOVERY DEADLINES;
25 [PROPOSED] ORDER

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28 Counsel for plaintiffs Sanrio Company, Ltd. and Sanrio, Inc. ("Plaintiffs") and
defendants that currently remain in the case respectfully submit this stipulation requesting an
extension of time for discovery and other dates as follows.

1 WHEREAS, the current trial date is in August 2011 and none of the changes in
2 deadlines set forth herein will impact that date;

3 WHEREAS, the undersigned parties participated in mediation on August 25, 2010;

4 WHEREAS, during the mediation, Plaintiffs' claims against four defendants were
5 settled (namely, Sukmin Bae, Lisa Bae a/k/a/ Hyang Hee Bae, and their two unincorporated
6 businesses called "Bliss" and "Final Choice") (the "Sukmin Bae Defendants").

7 Documentation of that settlement is in progress and the appropriate documents will be filed
8 with the Court in due course;

9 WHEREAS, Plaintiffs and defendants J.I.K Accessories, Inc., Accessitive
10 Accessories, Inc., B.B. Apparels Inc., Amuseco Accessories, Inc., Joon Sik Bae a/k/a/ Jason
11 Bae, Andy Bae, and Brian Bae (collectively, the "Joon Sik Bae Defendants") made progress
12 during the mediation and have agreed to continue negotiations and to engage in further
13 mediation, if necessary, in good faith efforts to reach settlement;

14 WHEREAS, Defendants John Bae, Aeran Bae a/k/a Chris Bae, and their two
15 unincorporated businesses called "Bliss" and "Final Choice" (collectively, the "John Bae
16 Defendants") are newly involved in the action (by stipulated order dated August 24, 2010, the
17 entry of default filed against them on December 2, 2010 was set aside, and the John Bae
18 Defendants filed their Answer on or about September 3, 2010;

19 WHEREAS, the current deadline to complete fact discovery is October 15, 2010;

20 WHEREAS, on July 15, 2010, Plaintiffs, the Sukmin Bae Defendants and the Joon Sik
21 Bae Defendants filed one prior stipulation and request to extend discovery dates, under which
22 the parties agreed that any formal discovery served prior to the mediation date shall be stayed,
23 and deemed served on the day after the final date that mediation is completed;

24 WHEREAS, counsel for all of the parties agree that extending the discovery deadlines as
25 requested herein would increase the likelihood of a successful settlement because the parties would
26 not need to expend additional resources for discovery while settlement negotiations are ongoing;

WHEREAS, counsel for all of the parties request that discovery and dispositive motion deadlines be extended accordingly;

WHEREAS, counsel for Plaintiffs and the John Bae Defendants request that discovery and dispositive motion dates be extended to provide them with adequate time to conduct initial disclosures, informally exchange information and documents to support settlement negotiations, and to conduct discovery;

WHEREAS, Plaintiffs and the Joon Sik Bae Defendants have agreed to continue their informal exchange of information and documents to support their ongoing settlement negotiations;

NOW, THEREFORE, by and through their counsel, the undersigned Parties hereby stipulate and request the Court to order as follows:

1. Discovery and dispositive motion deadlines shall be extended, with the new deadlines to be as follows:

Disclosure of witnesses (case in chief): December 17, 2010

Fact discovery cut-off: February 28, 2011

Expert disclosure: February 28, 2011

Rebuttal expert reports due: March 14, 2011

Expert discovery cut-off: April 15, 2011

Dispositive motions hearing: June 6, 2011

2. The stipulation to stay discovery entered into by Plaintiffs, the Sukmin Bae Defendants and the Joon Sik Bae Defendants shall now include the John Bae Defendants and shall continue until the date that Plaintiffs and each of the Defendants stipulate that their settlement negotiation and/or mediation process is completed, or November 15, 2010, whichever occurs first.

IT IS SO STIPULATED.

OWEN, WICKERSHAM & ERICKSON, P.C.

1 Date: September 9, 2010

By: /s/ Noel M. Cook

2 NOEL M. COOK

3 LINDA JOY KATTWINKEL

4 Attorneys for Plaintiffs

5 SANRIO COMPANY, LTD., and SANRIO, INC.

6 Date: September 9, 2010

7 BLEDSOE, CATHCART, DIESTEL,
8 PEDERSEN & TREPPA, LLP

9 By: /s/ L. Jay Pedersen

10 L. JAY PEDERSEN

11 JOSHUA N. ROSEN

12 Attorneys for Defendant

13 ACCESSITIVE ACCESSORIES, INC.

14 Date: September 9, 2010

15 TINGLEY PIONTKOWSKI LLP

16 By: /s/ Bruce Pointkowski

17 BRUCE C. POINTKOWSKI

18 JONATHAN A. MCMAHON

19 Attorney for Defendants

20 J.I.K. ACCESSORIES, INC.

21 ACCESSITIVE ACCESSORIES, INC.

22 B.B. APPARELS INC.

23 AMUSECO ACCESSORIES, INC.

24 JOON SIK BAE, ANDY BAE, and BRIAN BAE

25 S. CALVIN MYUNG

26 Date: September 9, 2010

27 By: /s/ S. Calvin Myung

28 S. CALVIN MYUNG

Attorney for Defendants

LEACH AND MCGREEVY

29 By: /s/ Richard E. McGreevy

30 RICHARD E. MCGREEVY

31 BRIAN LEACH

32 Attorney for Defendants

33 JOHN BAE AND AERON BAE,

1 DBA BLISS AND FINAL CHOICE
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IT IS SO ORDERED

7 Dated: 9/10, 2010.
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